

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2, individually,  
and on behalf of all others similarly situated, JANE  
DOE 3, individually, and on behalf of all others  
similarly situated, JANE DOE 4, individually, and  
on behalf of all others similarly situated, JANE DOE  
5, individually, and on behalf of all others similarly  
situated, and JANE DOE 6, individually, and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS, FIRST LADY CECILE DE  
JONGH, GOVERNOR KENNETH MAPP,  
SENATOR CELESTINO WHITE, ATTORNEY  
GENERAL VINCENT FRAZER, GOVERNOR  
JOHN DE JONGH, SENATOR CARLTON DOWE,  
DELEGATE STACEY PLASKETT, and JOHN  
DOES 1-100,

Defendants.

CIVIL ACTION NO.  
1:23-cv-10301-AS

**DECLARATION OF ERIC R. BRESLIN IN SUPPORT OF HER MOTION TO DISMISS**

I, Eric R. Breslin, declare as follows:

1. I am a partner at the law firm Duane Morris, LLP, counsel for Stacey Plaskett in this action. I submit this declaration in support of Congresswoman Plaskett's motion for sanctions pursuant to Federal Rule of Civil Procedure 11.

2. On March 19, 2024, I sent a letter to Plaintiffs' counsel identifying several factual inaccuracies and legal deficiencies in the Individual and Class Action Amended Complaint (the "First Amended Complaint"). The letter is attached here as Exhibit A.

3. A few days after sending this letter, Plaintiffs' counsel reached out to me. Plaintiffs' counsel told me they would consider dismissing the complaint against Congresswoman Plaskett if I sent them a copy of her deposition in the action *Gov't of the U.S. Virgin Islands v. J.P. Morgan Chase Bank, N.A.*, No. 1:22-cv-10904-JSR, ECF No. 1 (Dec. 27, 2022) (the "J.P. Morgan Action").

4. The deposition was covered by a confidentiality order. Before I could get the confidentiality designation lifted, Plaintiffs filed the Individual and Class Action Second Amended Complaint.

5. On June 10, 2024, we served a copy of this Rule 11 motion and memorandum of law on Plaintiffs' counsel by email and First Class Mail (RRR). Attached as Exhibit B is a copy of the June 10, 2024 letter served on counsel with its attachments.

6. Attached as Exhibit C is a copy of the affidavit of service, certifying service of the June 10, 2024 letter and attachments.

7. Attached as Exhibit D is a copy an email dated June 10, 2024 sending the June 10, 2024 letter and attachments to Plaintiffs' counsel.

Dated: July 2, 2024

/s/ Eric R. Breslin  
Eric R. Breslin